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September 11, 2007

By Facisimile: (914) 390-4085
Honorable Charles L. Briant
United States Courthouse
300 Quarropas Street, Rm. 275
White Plains, New York 10601-4150

*Time to Answer is extended
to October 5, 2007.
So Ordered
Sept. 11, 2007.
Charles L. Briant USJ*

Re: Valentin v. New York State Department of Correctional Services, 07 CV 7066 (CLB)

Your Honor:

I am an Assistant Attorney General in the Office of Andrew M. Cuomo, Attorney General of the State of New York, assigned to the defense of this matter. I write on behalf of defendant Department of Correctional Services ("DOCS") to respectfully request a thirty (30) day enlargement of time to answer, move or otherwise respond to the Complaint until October 10 2007. Plaintiff's counsel, Michael Sussman does not consent to this initial 30 day enlargement of time. Mr. Sussman, however, indicated that he does consent to a twenty (20) day enlargement of time.

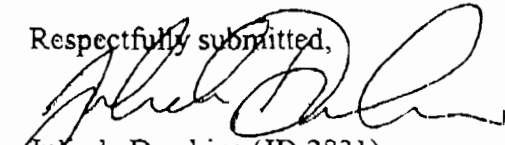
Plaintiff alleges that the defendant discriminated against him on the basis of his national origin in failing to defend his promotion during arbitration which lead to his demotion from Maintenance Supervisor 1 at Downstate Correctional Facility. An extension of time is necessary to afford this office the opportunity to properly investigate the allegations in the complaint, obtain any underlying documentation and fulfil its obligation under Rule 11 of the Federal Rules of Civil Procedure.

No previous requests for an extension of time to move or answer has been made. Accordingly, I request that defendant's time to respond to the complaint be enlarged to October

10, 2007.

I thank the Court for its consideration in this matter.

Respectfully submitted,



Julinda Dawkins (JD 2831)
Assistant Attorney General

cc: Michael H. Sussman, Esq.
Sussman & Watkins
(By Fax)